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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

CHRISTIAN DEMARCO THOMAS.

Defendant.

Case No.: 2:22-cr-00129-CDS-DJA

## **Unopposed Motion to Amend Indictment**

On June 8, 2022, the Grand Jury issued an indictment charging Christian Demarco

Thomas with one count of *Felon in Possession of a Firearm*, in violation of 18 U.S.C.

19 | §§ 922(g)(1) and 924(a)(2), and one count of *Felon in Possession of Ammunition*, in violation

20 of 18 U.S.C. §§ 922(G)(1) and 924(a)(2). The caption on the Criminal Indictment

21 misspelled the defendant's name – the H in his first name was missing (Cristian). The

22 government seeks to file an Amended Criminal Indictment, attached as Exhibit 1, to

23 correct the scrivener's error. The government contacted defendant's counsel on Thurs

24 || Page

1 June 16, 2022, and defendant does not object to the filing of the Amended Criminal  
2 Indictment.

3 DATED: June 21, 2022

4 JASON M. FRIERSON  
5 United States Attorney  
6 District of Nevada

7 /s/ Bianca R. Pucci  
8 BIANCA R. PUCCI  
9 Assistant United States Attorney

10 **IT IS SO ORDERED.**

11 DATED: June 23, 2022

12   
13 DANIEL J. ALBREGTS  
14 UNITED STATES MAGISTRATE JUDGE

## **GOVERNMENT EXHIBIT LIST**

- Exhibit 1: Amended Criminal Indictment

# EXHIBIT 1

1 JASON M. FRIERSON  
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13 **UNITED STATES DISTRICT COURT**  
14 **DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 vs.

18 CHRISTIAN DEMARCO THOMAS,

19 Defendant.

20 **AMENDED CRIMINAL**  
21 **INDICTMENT**

22 Case No.: 2:22-cr-00129-CDS-DJA

23 **VIOLATIONS:**

24 18 U.S.C. §§ 922(g)(1), 924(a)(2) – Felon in  
Possession of a Firearm

18 U.S.C. §§ 922(g)(1), 924(a)(2) – Felon in  
Possession of Ammunition

17 **THE GRAND JURY CHARGES THAT:**

18 **COUNT ONE**

19 Felon in Possession of a Firearm  
(18 U.S.C. §§ 922(g)(1), 924(a)(2))

20 On or about April 21, 2022 in the State and Federal District of Nevada,

21 **CHRISTIAN DEMARCO THOMAS,**

22 defendant herein, knowing he had previously been convicted of a crime punishable by  
23 imprisonment for a term exceeding one year, that is: *Carrying a Concealed Firearm or Other*

*Deadly Weapon*, in the Eighth Judicial District Court for Clark County, Nevada, on or about February 15, 2012, in case number C-11-276712-1; *Battery with use of a Deadly Weapon*, in the Eighth Judicial District Court for Clark County, Nevada, on or about March 12, 2012, in case number C-11-277045-1; *Attempt Carrying a Concealed Weapon*, in the Eighth Judicial District Court for Clark County, Nevada, on or about May 22, 2012, in case number C-11-273282-1; *Ownership or Possession of Firearm by Prohibited Person*, in the Eighth Judicial District Court for Clark County, Nevada, on or about April 5, 2015, in case number C-14-301595-1; *Attempt Battery with Substantial Bodily Harm*, in the Eighth Judicial District Court for Clark County, Nevada, on or about April 9, 2015, in case number C-15-304602-1; and *Ownership or Possession of Firearm by Prohibited Person*, in the Eighth Judicial District Court for Clark County, Nevada, on or about June 3, 2021, in case number C-20-351562-1; knowingly possessed a firearm, that is: a Glock 21, 45 caliber firearm, bearing serial number G43068; said possession being in and affecting interstate commerce and said firearm having been shipped and transported in interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

## COUNT TWO

**Felon in Possession of Ammunition  
(18 U.S.C. §§ 922(g)(1), 924(a)(2))**

On or about April 21, 2022 in the State and Federal District of Nevada,

## CHRISTIAN DEMARCO THOMAS,

defendant herein, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, that is: *Carrying a Concealed Firearm or Other Deadly Weapon*, in the Eighth Judicial District Court for Clark County, Nevada, on or about February 15, 2012, in case number C-11-276712-1; *Battery with use of a Deadly Weapon*, in the

1 Eighth Judicial District Court for Clark County, Nevada, on or about March 12, 2012, in  
2 case number C-11-277045-1; *Attempt Carrying a Concealed Weapon*, in the Eighth Judicial  
3 District Court for Clark County, Nevada, on or about May 22, 2012, in case number C-11-  
4 273282-1; *Ownership or Possession of Firearm by Prohibited Person*, in the Eighth Judicial  
5 District Court for Clark County, Nevada, on or about April 5, 2015, in case number C-14-  
6 301595-1; *Attempt Battery with Substantial Bodily Harm*, in the Eighth Judicial District Court  
7 for Clark County, Nevada, on or about April 9, 2015, in case number C-15-304602-1; and  
8 *Ownership or Possession of Firearm by Prohibited Person*, in the Eighth Judicial District Court for  
9 Clark County, Nevada, on or about June 3, 2021, in case number C-20-351562-1; knowingly  
10 possessed ammunition, that is: a Winchester hollowpoint .45 caliber cartridge, and 12 Speer  
11 hollowpoint .45 caliber cartridges; said possession being in and affecting interstate  
12 commerce and said firearm having been shipped and transported in interstate commerce, all  
13 in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

14  
15 **DATED:** this 21st day of June, 2022.

16 **A TRUE BILL:**

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18  
19 JASON M. FRIERSON  
20 United States Attorney

21   
22 BIANCA R. PUCCI  
23 Assistant United States Attorney